

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI

UNITED STATES OF AMERICA, )  
                                  )  
                                  )  
Plaintiff,                    )  
                                  )    No.: 17 CR 95  
vs.                            )  
                                  )  
OSCAR DILLON, III, et al., )  
                                  )  
                                  )  
Defendant.                    )

**DEFENDANT OSCAR DILLON III'S MOTION FOR LEAVE TO FILE JURY  
INSTRUCTION ON JANUARY 27, 2020**

COMES NOW, Defendant, OSCAR DILLON, III, by and through his undersigned attorneys, ad respectfully ask for leave to file his jury instruction on Monday, January 27, 2020, a request that the government does not object to. In support, the following is offered:

1.     Jury trial in the instant matter is scheduled to begin on February 3, 2020. A final pretrial conference is scheduled for January 29, 2020.
2.     On January 9, 2020, this Court filed its Order Setting Forth Trial Procedures in Criminal Cases. *See* Dkt. No. 370.
3.     Among other instructions, this Court indicated that both the government and defense counsel shall provide proposed instructions ten days prior to trial. *See* Dkt. No. 370 (pg. 4, ¶ 8(A)). Ten days prior to trial is January 24, 2020.
4.     The undersigned believes that it may be more efficient for the government to file their proposed jury instructions first, allow defense counsel to

simply respond to their proposed instruction by indicating which instructions the defense objects to, which instructions the defense requests an alternative version of, and providing any additional instruction which the defense believes the government left out. Defense counsel suspects that there will be no issue with the majority of the instructions proposed by the government. By allow defense counsel to response to the government's proposed instructions rather than file contemptuous proposed instruction will streamline any issues which may arise and allow for a more efficient pretrial conference.

5. By allowing this filing schedule for proposed jury instructions, this Court will still have all of the relevant filings two days prior to the schedule pretrial conference.

6. The undersigned spoke with Assistant U.S. Attorney Michael Reilly who indicated he does not object to the instant request.

Wherefore, for the reasons set forth above, defendant Oscar Dillon III respectfully asks this Honorable Court to enter an order allowing his counsels to respond to the government's proposed jury instruction by January 27, 2020 as opposed to filing contemporaneous proposed instruction on January 24, 2020.

Respectfully submitted,

/s/ Vadim A. Glozman  
*An Attorney for Oscar Dillon, III*

Blaire C. Dalton, #6305696IL  
DALTON LAW, LLC  
53 W. Jackson Blvd., Ste. 1550  
Chicago, Illinois 60604  
(847) 373-4750  
blairec.dalton@gmail.com

Vadim A. Glzman, #6315389IL  
VADIM A. GLOZMAN LTD.  
53 West Jackson Blvd., Suite 1410  
Chicago, Illinois 60604  
(312) 726-9015  
vg@glozmanlaw.com

**CERTIFICATE OF SERVICE**

I hereby certify that on January 22, 2020, a true and correct copy of the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon the following: all Attorneys of record.

/S/ Vadim A. Glzman